



NORTHERN MICHIGAN HOSPITAL

CON REVIEW STANDARDS FOR MAGNETIC RESONANCE IMAGING ("MRI") SERVICES

Hello, my name is James Flickema, and I am the Director for Professional Services for Northern Michigan Hospital ("NMH") in Petoskey. I would like to thank the Commission for identifying the need for technical changes to the CON Review Standards for MRI Services.

Over the years, the CON Commission has gone to great lengths to draft language in the CON Review Standards that makes a level playing field for the diverse planning areas throughout the state of Michigan. Accordingly, MRI language was created to equalize the weighting factor between rural and non rural areas when demonstrating evidence of need.

For example, Section 13(2)(a) of the MRI Standards provides for MRI procedure adjustments for MRI scans performed in a rural area:

(2)(a) For a site located in a rural or micropolitan statistical area county, or for the November 1, 2005 MRI Service Utilization List, a county designated as "rural" as that term was defined under the "standards for defining micropolitan areas in the 1990s" by the statistical policy office of the office of information and regulatory affairs of the United States office of management and budget, 55 F.R. p 12154 (March 30, 1990), the number of MRI adjusted procedures shall be multiplied by a factor of 1.4.

However, **Section 13(2)(e)** states that "*Subsection (2) shall not apply to an application proposing a subsequent fixed MRI unit (second, third, etc.) at the same site.*"

This language discriminates between new applicants and existing providers. New applicants seeking CON approval can utilize the rural multiplier, however existing providers with an established program cannot.

NMH would like to request a technical change to apply the multiplier uniformly to all applicants by modifying the standards accordingly. We are pleased to work with the Commission and the Department as appropriate to effectuate the identified proposed changes.

Thank you for your time and consideration.